

REMARKS

Applicant has studied the Office Action of 27 May 2003 and the Advisory Action of 25 August 2003. In response, Applicant files the present Request for Continued Examination and preliminary amendment. As Applicant argued in the previous responses, the references of record, either singly or in combination, do not teach or suggest that a firewall or a server positioned behind the firewall does the translating. Applicant has amended independent claims 1, 7, 9, 11, 13, and 15 to reflect the position where the translation occurs. Specifically, the translation occurs within the first IP network. Claim 5 already recites that it is the firewall that performs the translation. New claims 19-21 recite in a Markush grouping precisely what elements within the first IP network are contemplated as performing the translating. As the total number of claims is now 21, Applicant encloses payment for a claim over 20.

In contrast, Arrow's translation device 808 is clearly positioned outside the first IP network, and thus, cannot teach or suggest the claim elements. To this extent, the Patent Office has not established *prima facie* obviousness, and the claims define over the rejections of record.

Applicant further renews its arguments that the Patent Office has impermissibly extracted isolated components of the references using impermissible hindsight reconstruction. Specifically, it is improper to extract the control messages of Cave and substitute them into Zhang as the Patent Office proposes. While Applicant acknowledges that the Examiner is unpersuaded by this argument, Applicant wishes to preserve this position in the event of an appeal and restates this position for that purpose.

Applicant requests reconsideration of the rejections in light of the amendments to the claims and claim allowance at the Examiner's earliest convenience.

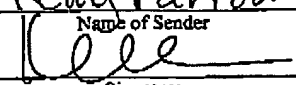
Respectfully submitted,

WITHROW & TERRANOVA, P.L.L.C.

By: 

Benjamin S. Withrow
Registration No. 40,876
P.O. Box 1287
Cary, NC 27512
Telephone: (919) 654-4520

Date: September 26, 2003
Attorney Docket: 7000-246

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